

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF VIRGINIA
NORFOLK DIVISION**

I/P ENGINE, INC.,)
Plaintiff,)
v.)
AOL, INC. et al.,)
Defendants.)
Civ. Action No. 2:11-cv-512

**PLAINTIFF I/P ENGINE, INC.'S MOTION FOR AN AWARD OF PREJUDGMENT
INTEREST, POST-JUDGMENT INTEREST, AND SUPPLEMENTAL DAMAGES FOR
DEFENDANTS' POST-DISCOVERY/PRE-VERDICT INFRINGEMENT**

Plaintiff I/P Engine, Inc. (“I/P Engine”), as the prevailing party, hereby moves this Court for an award in accordance with 35 U.S.C. § 284 that includes prejudgment interest, post-judgment interest, and reasonable royalty damages from September 15, 2011 through entry of judgment against defendants AOL, Inc., Google Inc., IAC Search & Media, Inc., Gannett Company, Inc., and Target Corp. (“Defendants”).

In support of this Motion, I/P Engine provides the accompanying Memorandum of Law, Declaration of Dr. Stephen L. Becker, and Declaration of Dawn Rudenko, and accompanying exhibits.

Dated: November 9, 2012	Respectfully submitted, <u>By: /s/ Jeffrey K. Sherwood</u> Donald C. Schultz (Virginia Bar No. 30531) W. Ryan Snow (Virginia Bar No. 47423) CRENSHAW, WARE & MARTIN PLC 150 West Main Street Norfolk, VA 23510 Telephone: (757) 623-3000 Facsimile: (757) 623-5735
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CERTIFICATE OF SERVICE

I hereby certify that on this 9th day of November, 2012, the foregoing, PLAINTIFF I/P ENGINE, INC.'S MOTION FOR AN AWARD OF PREJUDGMENT INTEREST, POST-JUDGMENT INTEREST, AND SUPPLEMENTAL DAMAGES FOR DEFENDANTS' POST-DISCOVERY/PRE-VERDICT INFRINGEMENT, was served via the Court's CM/ECF system on the following:

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